

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PERFORADORA ORO NEGRO, S. DE R.L.
DE C.V., *et al.*

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 18-11094 (SCC)
(Jointly Administered)

GONZALO GIL-WHITE, PERSONALLY
AND IN HIS CAPACITY AS FOREIGN
REPRESENTATIVE OF PERFORADORA
ORO NEGRO, S. DE R.L. DE C.V. AND
INTEGRADORA DE SERVICIOS
PETROLEROS ORO NEGRO, S.A.P.I. DE
C.V.

Adv. Pro. No. 19-01294

Plaintiff,

-against-

ALP ERCIL; ALTERNA CAPITAL
PARTNERS, LLC;
AMA CAPITAL PARTNERS, LLC;
ANDRES CONSTANTIN ANTONIUS-
GONZÁLEZ; ASIA RESEARCH AND
CAPITAL MANAGEMENT LTD.; CQS
(UK) LLP; FINTECH ADVISORY, INC.;
DEUTSCHE BANK MÉXICO, S.A.,
INSTITUCIÓN DE BANCA MÚLTIPLE;
GARCÍA GONZÁLEZ Y BARRADAS
ABOGADOS, S.C.; GHL INVESTMENTS
(EUROPE) LTD.; JOHN FREDRIKSEN;
KRISTAN BODDEN; MARITIME
FINANCE COMPANY LTD.; NOEL BLAIR
HUNTER COCHRANE, JR; ORO NEGRO
PRIMUS PTE., LTD.; ORO NEGRO
LAURUS PTE., LTD.; ORO NEGRO
FORTIUS PTE., LTD.; ORO NEGRO
DECUS PTE., LTD.; ORO NEGRO
IMPETUS PTE., LTD.; PAUL MATISON

LEAND, JR.; ROGER ALAN BARTLETT;
ROGER ARNOLD HANCOCK; SEADRILL
LIMITED; SHIP FINANCE
INTERNATIONAL LTD.; and DOES 1-100

Defendants.

STIPULATED SERVICE AND RESPONSE SCHEDULE ORDER

WHEREAS, the Plaintiffs, Fernando Perez Correa, in his capacity as Foreign Representative of both Integradora de Servicios Petroleros Oro Negro, S.A.P.I. de C.V. and Perforadora Oro Negro, S. de R.L. de. C.V. (together, the “Debtors”), and Gonzalo Gil-White, in his personal capacity, filed the above-captioned lawsuit on June 6, 2019; and

WHEREAS, on September 4, 2019, Defendant John Fredriksen agreed to accept service of the Complaint [ECF 9], subject to his reservation of all defenses or objections to the lawsuit, the court’s jurisdiction, and the venue of the action; and

WHEREAS, on September 6, 2019, Fredriksen and the Plaintiffs agreed to a schedule for the filing of motions or responsive pleadings in this matter.

Based on the foregoing, it is hereby **STIPULATED, AGREED AND ORDERED AS FOLLOWS:**

1. Fredriksen has been served with the Complaint and Summons as of September 4, 2019. Fredriksen retains all defenses or objections to the lawsuit, the court’s jurisdiction, and the venue of the action, and waives only any objections to service.
2. Fredriksen shall respond to the Complaint by October 11, 2019.
3. The Plaintiffs shall file their response to any motion to dismiss the Complaint by November 11, 2019.

4. Fredriksen shall file any reply in support of any motions to dismiss the Complaint by December 4, 2019.

Dated: September 27, 2019
New York, New York

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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Counsel for the Foreign Representative

Dated: September 27, 2019
New York, New York

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/s/ *Scott D. Musoff*

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Attorneys for John Fredriksen

ENTERED this 26th day of September, 2019.

SO ORDERED

/S/ *Shelley C. Chapman*

THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY COURT